

**In the Matter of)
Petition for Forbearance From)
The Current Pricing Rules for)
The Unbundled Network Element)
Platform)**

WC Docket No. 03-157

REQUEST FOR EXTENSION OF COMMENT PERIOD

On July 3, 2003 the FCC issued a Public Notice establishing a pleading cycle on Verizon's petition for expedited forbearance from the Commission's current pricing rules for the unbundled network element platform filed July 1, 2003 in WC Docket No. 03-157.

On July 8, 2003, AT&T Corp., Birch Telecom, Broadview Networks, Inc., Covad Communications Company, MCI, Sage Telecom, Inc., Talk America, Z-Tel Communications, Inc., CompTel and the PACE Coalition filed a request for a three-week extension of the deadline for filing comments established in the July 3rd FCC Notice. Specifically, those companies requested the FCC extend the deadline from July 28, 2003 to August 18, 2003 and also extend to the deadline for filing reply comments to September 2, 2003.

NARUC agrees the arguments presented in the July 8, 2003 extension request. Verizon's Petition raises legal and factual issues regarding the Commission's TELRIC pricing rules, the standard for forbearance, and whether there is any legitimate relationship between TELRIC pricing and investment in the telecommunications industry. Many of these allegations were raised in the Triennial Review Proceeding and proved there to be baseless, the Petition, as well as the 29-page white paper entitled "*The Negative Effect of Applying TELRIC Pricing to the UNE Platform on Facilities-Based Competition and Investment*" attached to the Petition, require a full response supported by necessary factual and economic data to ensure that the record of this proceeding is complete. Preparation of such a response will require more than the 3-week period that commenters are currently allowed.

Indeed, quite a few of NARUC's state commission members specifically requested that NARUC file supporting the extension request. Moreover, NARUC is meeting in Denver the last week of July. As of the date of this filing, one of the policy resolutions up for discussion and possible passage at that meeting addresses the subject Verizon forbearance petition.

Moreover, NARUC also agrees that the issues raised in Verizon’s Petition may be informed or addressed by the conclusions reached in the Triennial Review Proceeding, specifically by the “clarifications” to the TELRIC pricing rules that the Commission has announced will be made in its Final Report and Order on the Triennial Review Proceeding.

Because that Final Order has not yet been released, commenters have no way of knowing how many clarifications – or any other Commission conclusions in that Order – may impact the issues raised by Verizon in this proceeding.

For all these reasons, the National Association of Regulatory Utility Commissioners respectfully request a brief three-week extension to both the initial and reply comment deadlines.

Respectfully submitted,

_____/s/_____

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